

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

MDL No. 2262, 11 Civ. 2613

Master File No. 1:11-md-2262-NRB

THIS DOCUMENT RELATES TO: EXCHANGE-
BASED PLAINTIFF ACTION

ECF Case

**NOTICE OF EXCHANGE-BASED PLAINTIFFS' MOTION
FOR LEAVE TO AMEND AS TO ANTITRUST CLAIMS AND FILE
THE SECOND AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that the undersigned attorneys for the Exchange-Based Plaintiffs will move this Court before the Honorable Judge Naomi Reice Buchwald, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order granting the Exchange-Based Plaintiffs' Motion for Leave to Amend as to Antitrust Claims and to File the Second Amended Consolidated Class Action Complaint. The grounds for this motion are that the Exchange-Based Plaintiffs' new allegations address the Court's holding dismissing Exchange-Based Plaintiffs' antitrust claims for lack of antitrust injury, as expressed in the order dated March 29, 2013. *See In re LIBOR-Based Fin. Instruments Antitrust Litig.*, No. 11 MD 2262 (NRB), 2013 WL 1285338 (S.D.N.Y. Mar. 29, 2013). The grounds are more fully set forth in the accompanying Exchange-Based Plaintiffs' Memorandum of Law in Support of Motion for Leave to Amend as to Antitrust Claims and File the Second Amended Consolidated Class Action Complaint.

DATED: May 17, 2013
New York, New York

/s/ David Kovel

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